Number	Submitter	nonpt	np_oilgas	ptnonipm	pt_oilgas	ptegu	mobile	nonroad	biog	Platform	Supplemental Info?	Sector	Responsible EPA/MJ	Action	Summary of Comment	Action	Status
0085	WEST								yes	2023	No	Biogenics		West Uses Megan/East uses BEIS	Conduct sensitivity testing to identify which biogenic model best represents western regions or mitigate the implications of using a less accurate one		
0085	WEST	yes								2023	Not yet	Biogenics/NONPT			Use lightning NOx emissions		
0063	CT DEEP					yes				2023	Yes	EGU	MJO/State	MJO fix ERTAC, EPA Fix IPM	Some Retired/non-operational EGUs in 2023 IPM are incorrect - see Table 5 in CT DEEP pdf		
0042	Kansas City Board of Public Utilities					yes				2011	Yes	EGU		MJO fix ERTAC, EPA Fix IPM	Stack Parameter updates		
0060	Kansas Dep. Health & Environment					yes				2016	Yes	EGU		MJO fix ERTAC, EPA Fix IPM	Incorporate recent reductions to EGU emissions; incorporate new wind generation (see 2015_InterstateTransportOZONE_NODA_comments_kswind.xlsx; Also consdier ERTAC EGU instead of IPM		
0058	OK DEQ					yes				2016	Yes	EGU		MJO fix ERTAC, EPA Fix IPM	EGU retirements (see them listed in OKDEQ pdf); also solar and wind units coming online;		
0048	TCEQ					yes				2023	Yes	EGU		MJO fix ERTAC, EPA Fix IPM	Correct base-year and future-year EGU emissions for 4 facilities (listed and described in TCEQ pdf)		
0085	WEST					yes				2023	Some	EGU		MJO fix ERTAC, EPA Fix IPM	peaking units should be kept separate and QA'd more accurately		
0080	WESTAR					yes				2011	Yes	EGU		MJO fix ERTAC, EPA Fix IPM	Stack Parameter updates		
0082	Sunflower					yes				2011	Yes	EGU		MJO fix ERTAC, EPA Fix IPM	Stack Parameter updates		
0075	NC DAQ	yes								2023	No	Fires			Remove anomalous wildfires (2) that occurred in 2011		
0085	WEST	yes								2023	No	Fires			Replace SMARTFIRE emissions with PMDETAIL to improve western model performance; also remove fires that are exceptional events (?)		
0063	CT DEEP			yes						2023	Yes	NONEGU			SO2 from MWCs should be reduced as they are more than double 2015 values in some cases; Note these were dropped from the 2023 projection anyway		
0084	MO DNR			yes						2023	Yes	NONEGU			Unit Closures from 2015; also 3 boilers are exclusively gas-burning as of 2018 and need to be updated in 2023 projections		
0057	WI DNR			yes						2016	Some	NONEGU			Use the WI DNR recommended NOx and SO2 control levels for specific units in WI (see Figure 1); add 4 new units that have recently been installed (see Figure 2); Allow WI to provide unit-level control updates routinely for more reasonable projections		
0066	American Forest & Paper Association	yes		yes	yes					2016	No	NONEGU	EPA		actual cost of controls and timing of industrial boiler retrofit projects for industrial boilers, as well as feasibility and effectiveness of NOx controls		
0066	American Forest & Paper Association	yes		yes	yes					2017	No	NONEGU	MJO/State		remove shut down, replaced or converted industrial boilers and process heaters; update facility boiler and process heater NOx emission to reflect new configurations		
0074	API			yes						2023	No	NONEGU	EPA		2023 Refinery emissions account for NSPS Ja requirements for process heaters but not refinery flares; Additionally, the TSD does not mention any projected changes in refinery emissions due to the Refinery Sector Rule nor as a result of several new or modified Consent Decrees		
0063	CT DEEP	yes		yes			yes			2023	Some	NONEGU		EPA	EPA should consider measures beyond the EGU sector (e.g., full installation and operation of SCR & SNCR, high demand/ozone day requirements, performance standards) to also include non-EGU point sources (e.g., ICI boilers, cement kilns), area sources (e.g., low sulfur fuel oils that provide NOx benefits) and mobile sources (e.g., tighter diesel engine standards, aftermarket catalysts)		
0062	IERG			yes						2023	No	NONEGU	EPA/LADCO		2015 VOC and PM emissions from ptnonipm are already lower than EPA's 2023 projection (2015 emissions do not reflect reductions like Boiler MACT)		
0062	IERG			yes		yes				2023	No	NONEGU	EPALADCO		Actual 2014 SO2 emissions are lower than 2023 projections; use more accurate SO2 emission data; they give EIS facility 7940411 as an example		
0062	IERG									2011	Yes	NONEGU	EPA/LADCO		Cronus Chemicals LLS (EIS Facility 16787211) is in wrong county - move from Will County, Illinois to Douglas County, Illinois		
0062	IERG			yes						2011/2023		NONEGU	EPA/LADCO		Account for 3 consent decrees issued for facilities in Illinois in 2005: https://www.epa.gov/enforcement/conocophillips-global-refinery-settlement , https://www.epa.gov/enforcement/citgo-petroleum-corporation-and-pdv-midwest-refining-llc-settlement#injunctive, https://www.epa.gov/enforcement/first-amendment-2012-us-v-marathon-petroleum-co-clean-air-act-consent-decree (pg. 9-10)		
0062	IERG	yes		yes						2023	No	NONEGU	EPA/LADCO		35 IAC Part 217 Subparts E, F, G, H, I, and M NOx reductions are not accounted for in CoST control packets for emissions projections (TSD updates to 2011v6.3 to 2023); TSD section 4.2.4.7 says NOx reductions for Part 217 occured prior to 2011, but IERG believes this is not an accurate assumption since compliance date is 2015.		
0062	IERG			yes						2023	No	NONEGU	EPA/LADCO		sulfur rules (35 IAC 214 subparts B and D) and SO2 emisison limits (35 IAC 214 subpart AA) are not included in CoST control packet projections for 2023 and should be as the rules are in effect in Illinois (gave example of EIS Facility 4504711 which is projected for 7,003 tpy SO2 but has limit of 819.06 tpy)		
0062	IERG			yes						2023	No	NONEGU	EPA/LADCO		VOC emission limits (35 IAC 218.187 and 219.187) have a compliance date of Jan 1, 2012 should be added to CoST control packets		
0083	KY DAQ	yes		yes	yes					2023	No	NONEGU			Improvements needed to non-EGU control data		
0089	MOG									2023	Some	NONEGU			PA RACT (RACT II threshold is 100 and 50 TPY for NOx and VOC in the 5 county Phila area; CT RACT and HEDD; Boiler MACT - at least 5000 tons of NOx reductions may not have been accounted for by EPA in its modeling		
0075	NC DAQ			yes	yes	yes				2023	Yes	NONEGU			Errors in the facility closure, growth factor, and boiler MACT control files for the non-EGU sector - replacement files submitted with comments; request that EPA replace all NC records in BETA_Projections_PT_NonERTAC_20 in the ptnonipm.xlsx growth fact file with records from their submitted "NCDAQ_PROJECTION_PtGFs_2011_2023_040517.xlsx; See also NCDAQ_CONTROL_2011v6_2_2023_Boiler_MACT_040617.xlsx; Also, NC DAQ will be updating non-EGU point (and nonpoint) source growth factors and will submit them to EPA		
0080	WESTAR			yes						2023	No	NONEGU			Expand the type of sources (i.e., non-EGU) that are subjected to emission reductions		
0057	WI DNR			yes						2023	No	NONEGU			Project future industrial point source emissions to the unit-specific characterizations that are done for EGUs		
0074	API							yes		2023, 2011	No	NONROAD		Discuss with Commenter	Review diesel non-road fuel consumption with the diesel fuel consumption trends by equipment type - gave 3 suggested steps		
0074	API							yes		2016	No	NONROAD		Discuss with Commenter	Make use of more detailed spatial allocation data; Fleet turnover to Tier 4 locomotive engines, and rebuild rates for Tier 0, 1, and 2 existing engines should also be reconsidered in light of recent trends - gave 4 suggested steps		
0074	API							yes		2016	Yes	NONROAD		Discuss with Commenter	Update commercial marine vessels sector with vessel movement data now available for small vessels, as well as historic information for large vessels; Also forecasted emission reductions in PM, NOx, and SO2 due to the designations within the Exclusive Emission Zone (EEZ) See Table 4 in API's pdf		
0077	LADCO							yes		2024	Yes	NONROAD	MJO/State		Recreational equip. growth indicator #95 is too high; looks like snowmobile populations are too high (similar problems in all-terain vehicles and offroad motorcycles); Rec. equip. should be more reflective of a flat growth; See charts 3-8 in LADCO pdf		
0075	NC DAQ							yes		2023	Yes	NONROAD			Replace default national nonroad diesel equip. pop growth rates 1995-2015 period for Construction and Farm sectors with actual NC historical data as reported by EIA; Use NC DAQ-developed locomotive projection factors (See NATION.GRW.txt and NCDAQ_nrgrowthndex.xlsx)		
0057	WI DNR							yes		2023	Not yet	NONROAD			Use LADCO (still developing) updated commericial marine emission estimates for Great Lakes and major rivers in Mississippi River system when available		
0074	API				yes					2023	Yes	Oil&Gas			Consider using basin-level oil & gas growth factors (from EIA); See example AEO-based growth factors in Table 7 in API's pdf; Also add emissions resulting from additional flaring activity (compliance with O&G NSPS OOOO and OOOOa) annd more fully document the limitations of applying these requirements to only new emissions and not modified facilities		
0074	API									2023	No	Oil&Gas			State regulatory programs should be accounted for in forecast year inventories and documented in the TSD		
0062	IERG		yes		yes					2023	No	Oil&Gas			While Illinois is part of EIA East O&G, IERG feels that the projection factors for the East do not accurately represent increases in production or emissions in Illinois and suggest making necessary corrections to improve the inventory		
0083	KY DAQ				yes					2023	Yes	Oil&Gas			Excessive growth to np oil/gas NOx and VOC; KY DAQ predicts decrease in gas and modest increase in oil		

0048	TCEQ				yes					2023	Not yet	Oil&Gas			TCEQ updated O&G info to 2015 levels and will provide it (check docket or contact them directly)		
0085	WEST		yes		yes					2023	Yes	Oil&Gas			EPA should incorporate existing estimates from western states or WESTAR for O&G emission estimates to ensure the NEI data is complete and to develop realistic growth/control emisisons		
0077	LADCO						yes			2023	Some	ONROAD			LADCO asks why diesel idling is such a dominate contributor to 2023 inventories (included bar chart of onroad NOx annual emissions, 2023 Combination Trucks); Why significant increases in light duty diesel vehicle pops and VMT; Will EPA update future year fleet mix and travel to be more reflective of reality given the recent Volkswagen legal action?; There is a 40+ fold increase in E85 from 2011 to 2023, why? LADCO encourages EPA to be receptive of updated 2023 VMT estimates from LADCO states that will take longer than comment period		
0052	VA DEQ						yes			2023	Yes	ONROAD			Included many tables and graphs; asks EPA to review and verify their results of each of these; They noticed unusual emission rates for gasoline and diesel vehicles and ask EPA to review and verify; Doesn't agree with EPA's representative county selections and asks EPA to review and update; Also comments on EPA Age Projection Tool - artificial recession at vehicle age 7 in 2018 projections; DEQ encourages EPA to continue updating MOVES model defaults and assisting states in obtaining data for the 10 remaining MOVES model vehicle types		
0057	WI DNR						yes			2023	Not yet	ONROAD			LADCO will provide data updates to EPA as needed for onroad emissions		
0075	NC DAQ						yes			2023	Yes	Onroad			NC DAQ submitted state-certified county-level human pop projections to replace those used to project 2017 VMT by light-duty vehicles; EPA overestimated LD VMT for 80 counties; see NCDAQ_NC_Population_Projections_040517.xlsx		
0062	IERG	yes	yes	yes	yes					2023	No	Other_AR			Use LADCO-provided state and regional information to more accurately forecast emissions from Illinois		
0062	IERG	yes								2023	No	Other_AR			EPA has projected no change in residential gas combustion from 2011 to 2023; IERG asserts that older furnaces and hot water heaters will be replaced with newer, more efficient units. Also cites the proposed Energy Conservation Program: Energy Conservation Standards for Residential Furnaces. Citations: https://www.federalregister.gov/documents/2016/09/23/2016-22080/energy-conservation-program-energy-conservation-standards-for-residential-furnaces. 29 EPA-HQ-OAR-2016-0751-0009, Section Section 4.2.3.5 Oil and gas industrial source growth (nonpt, np_oilgas, ptnonipm, pt_oilgas) Table 4-13.		
0062	IERG	yes								2023	No	Other_AR			EPA should reconsider the decision to hold constant VOC emissions from nonpt because consumer products are trending toward reduced VOC content in their formulations due to market-driven forces demanding "greener" products		
0060	Kansas Dep. Health & Environment									2016	Some	Unidentified			Replace 2011 platform with newer; prefer 2014 NEI-based platform		
0058	OK DEQ		yes		yes					2016	No	Unidentified			Move away from 2011 platform and onto one that uses 2014NEI because the OK NEI submission incorporated detailed inventories from over 4,000 pemitted wellhead facilities, among other things		
0080	WESTAR									2016	No	Unidentified			Move away from 2011 platform		
0080	WESTAR			yes		yes				2023	Some	Unidentified			Design values are higher than actual measured, holds true especially for nonattainment receptor sites for which Kansas is linked		